

August 19, 2011

**Ex Parte**

**Filed via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: RM No. 11592 – Petition for Rulemaking Regarding 700 MHz Band Mobile Equipment Design and Procurement Practices**

**WT Docket No. 11-18 – Applications of AT&T Mobility Spectrum LLC and Qualcomm Incorporated for Consent to Assign Lower 700 MHz Band Licenses**

**RM – 11626 Request for Licensing Freezes and Petition for Rulemaking to Amend the Commission’s DTV Table of Allocations to Prohibit the Future Licensing of Channel 51 Broadcast Stations and to Promote Voluntary Agreements to Relocate Broadcast Stations From Channel 51**

**WC Docket No. 05-337 – High Cost Universal Service Support**

Dear Ms. Dortch:

On August 18, 2011, Kevin Joseph, a legislative consultant to Cellular South, and I met with Amy Levine, Special Counsel to Chairman Julius Genachowski.

During the meeting we discussed the lack of interoperability in the 700 MHz spectrum. Cellular South reiterated several points made in previous filings in the above proceedings regarding the urgent need for the FCC to resolve interoperability concerns in the 700 MHz bands. Cellular South continues to urge the Commission not to grant the applications for assignment of 700 MHz licenses from Qualcomm to AT&T without conditions that preclude anticompetitive 700 MHz equipment design and procurement practices, or which exclude Lower 700 MHz Band, Frequency Block A capability in LTE wireless devices that it offers to subscribers. Specifically, AT&T should be required to support Band Class 12 wireless devices, not Band Class 17 devices.

Also, Cellular South expressed support for Commission action on a freeze on the acceptance, processing, and grant of applications for new TV facilities on Channel 51 or requests by existing licensees to relocate to Channel 51.

Finally, Cellular South discussed the need for any proposed Universal Service reform to encourage competition through the utilization of forward-looking cost modeling and portability of support among multiple wireless service providers in each supported area.

Cellular South files this *ex parte* notice pursuant to Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Moncrief". The signature is stylized with a large, looped "y" at the end.

Benjamin M. Moncrief  
Manager, Public Policy

cc: Amy Levine (via email)